

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

ANTHONY EID, an individual,

Case No. 2:20-cv-11718

Plaintiff,

Hon. Gershwin A. Drain  
Mag. Judge David R. Grand

v.

WAYNE STATE UNIVERSITY,  
WAYNE STATE UNIVERSITY  
SCHOOL OF MEDICINE,  
NIKOLINA CAMAJ, MARGIT  
CHADWELL, MATT JACKSON,  
RICHARD S. BAKER, and R. DARIN ELLIS,  
in their individual and official capacities,  
jointly and severally,

Defendants.

---

**PLAINTIFF'S *EX PARTE* MOTION FOR LEAVE TO FILE RESPONSE  
BRIEF IN EXCESS OF THE TWENTY-FIVE PAGE LIMIT**

Plaintiff, Anthony Eid (hereinafter, “Plaintiff”) hereby respectfully moves *ex parte* that this Honorable Court for Leave to file a Response brief in excess of twenty-five pages, and in support thereof state as follows:

1. On January 31, 2022, Defendants filed their Motion for Summary Judgment against all counts of Plaintiff’s Amended Complaint. (**ECF No. 43**).

2. Local Rule 7.1(d)(3)(A) limits the text of a response brief, including footnotes and signatures, to twenty-five (25) pages. However, the Local Rules also permit parties to seek page limit extension by filing an *ex parte* motion with the Court. *Id.*

3. Plaintiff respectfully requests a 20-page extension to their forthcoming Reply brief, not to exceed forty-five (45) pages.

4. The parties have conducted extensive discovery including the multiple depositions of Plaintiff and depositions of four of the named individual Defendants, in addition to the voluminous written discovery exchanged by the parties.

5. An extension is appropriate given the number of claims at issue and the lengthy and complicated legal analysis involved in analyzing several of the claims.

6. Plaintiff requires additional pagination to address and rebut legal and factual arguments advanced by Defendants in their Motion for Summary Judgment (**ECF No. 43**), including with reference to the factual record underpinning this case and legal analysis of claims and defenses.

WHEREFORE, Plaintiff respectfully request that this Honorable Court grant its *Ex Parte* Motion for Leave to File Response Brief in Excess of the Twenty-Five Page Limit, permitting Plaintiff to file a Response brief in support of their opposition to Defendants' Motion for Summary Judgment not to exceed forty-five (45) pages.

**ROSSMAN, P.C.**  
*Attorneys for Plaintiff*

By: /s/ Elizabeth M. Vincent  
Mark C. Rossman (P63034)  
Elizabeth M. Vincent (P76446)  
2145 Crooks Road, Suite 220  
Troy, Michigan 48084  
Telephone: 248.385.5481  
mark@rossmanpc.com  
liz@rossmanpc.com

Dated: February 17, 2022

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

ANTHONY EID, an individual,

Case No. 2:20-cv-11718

Plaintiff,

Hon. Gershwin A. Drain  
Mag. Judge David R. Grand

v.

WAYNE STATE UNIVERSITY,  
WAYNE STATE UNIVERSITY  
SCHOOL OF MEDICINE,  
NIKOLINA CAMAJ, MARGIT  
CHADWELL, MATT JACKSON,  
RICHARD S. BAKER, and R. DARIN ELLIS,  
in their individual and official capacities,  
jointly and severally,

Defendants.

---

**PLAINTIFF'S BRIEF IN SUPPORT OF *EX PARTE* MOTION FOR  
LEAVE TO FILE RESPONSE BRIEF IN EXCESS OF THE TWENTY-  
FIVE PAGE LIMIT**

For the reasons set forth in Plaintiff's accompanying Motion for Leave, Plaintiff respectfully requests this Court grant its *Ex Parte* Motion for Leave. As described therein, Plaintiff finds legal support for its request for relief from Local Rule 7.1 and given the facts and circumstances of the case at bar.

Respectfully submitted,

**ROSSMAN, P.C.**  
*Attorneys for Plaintiff*

By: /s/ Elizabeth M. Vincent  
Mark C. Rossman (P63034)  
Elizabeth M. Vincent (P76446)  
2145 Crooks Road, Suite 220  
Troy, Michigan 48084  
Telephone: 248.385.5481  
mark@rossmanpc.com  
liz@rossmanpc.com

Dated: February 17, 2022

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing, PLAINTIFF'S *EX PARTE* MOTION FOR LEAVE TO FILE RESPONSE BRIEF IN EXCESS OF TWENTY-FIVE PAGE LIMIT, and related brief, was served on February 17, 2022, through the ECF filing system, which will send notification of such filing to all ECF participants.

By: /s/ Elizabeth M. Vincent  
Mark C. Rossman (P63034)  
Elizabeth M. Vincent (P76446)  
2145 Crooks Road, Suite 220  
Troy, Michigan 48084  
Telephone: 248.385.5481  
mark@rossmanpc.com  
liz@rossmanpc.com